

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

KIRK B. LENHARD, ESQ., Nevada Bar No. 1437
NIKKI L. BAKER, ESQ., Nevada Bar No. 6562
EMILY A. ELLIS, ESQ., Nevada Bar No. 11956
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135
Email: klenhard@bhfs.com
Email: nbaker@bhfs.com

DENNIS H. HRANITZKY, ESQ. (admitted *pro hac*)
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036-6797
Telephone: 212.698.3500
Facsimile: 212.698.3599
Email: dennis.hranitzky@dechert.com

Attorneys for Plaintiff NML Capital Ltd.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NML CAPITAL LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

CASE NO.: 2:14-cv-00492-RFB-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR NML TO
FILE RESPONSE TO MOSSACK
FONSECA'S MOTION TO QUASH
SUBPOENA (DKT. #159)**

(FIRST REQUEST)

Plaintiff NML Capital, Ltd. ("NML"), by and through its attorneys of record, Kirk B. Lenhard, Esq., and Nikki L. Baker, Esq., of Brownstein Hyatt Farber Schreck, LLP, and Dennis H. Hranitzky, Esq., of Dechert LLP, and Mossack Fonseca & Co. ("Mossack Fonseca"), by and through its attorneys of record, Frank M. Flansburg, III, Esq., and Brian Blankenship, Esq., of Schwartz Flansburg PLLC, and Dennis M. Campbell, Esq., of Campbell Law Firm PLLC, hereby agree and stipulate, subject to the Court's approval, as follows:

1. On June 3, 2015, the Court granted Mossack Fonseca's Unopposed Motion to Intervene for the Limited Purpose of Contesting Service of Process and Jurisdiction (Dkt. #106).

1 2. On June 17, 2015, NML and Mossack Fonseca (together, the “Parties”) filed a
2 stipulation and order extending any time limitations for Mossack Fonseca to submit filings and
3 briefing challenging service of process and personal jurisdiction twenty-one (21) days—up to and
4 including Friday, July 10, 2015 (Dkt. #144).

5 3. On July 1, 2015, the Court granted the order extending Mossack Fonseca’s time to
6 file (Dkt. #149).

7 4. Mossack Fonseca filed its Motion to Quash Subpoena on July 10, 2015.

8 5. Due to the Parties’ continued discussions regarding a potential resolution of this
9 matter, as well as NML’s lead counsel and lead associate being out of the office for an extended
10 period of time, NML requires additional time to adequately respond to Mossack Fonseca’s
11 Motion to Quash Subpoena.

12 6. Mr. Campbell and Mr. Flansburg, on behalf of Mossack Fonseca, has agreed to
13 extend the deadline for NML to file its response to Mossack Fonseca’s Motion to Quash
14 Subpoena twenty-one (21) days, or up to and including August 14, 2015.

15 7. In light of the foregoing, the Parties submit that good cause exists for the Court to
16 grant this Motion, and respectfully request that the Court extend the deadline for NML to respond
17 to the Motion to Quash twenty-one (21) days, or up to and including August 14, 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

DATED this 16th day of July, 2015.

SCHWARTZ FLANSBURG PLLC

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Frank M. Flansburg III, Esq.

Frank M. Flansburg III, Esq.
Nevada Bar No. 6974
Brian Blankenship, Esq.
Nevada Bar No. 11522
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119

By: /s/ Kirk B. Lenhard, Esq.

Kirk B. Lenhard, Esq.
Nevada Bar No. 1437
Nikki L. Baker, Esq.
Nevada Bar No. 6562
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

Dennis M. Campbell, Esq.
(*pro hac* pending)
Campbell Law Firm PLLC
95 Merrick Way, Suite 514
Coral Gables, FL 33134

Dennis H. Hranitzky (admitted *pro hac*)
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036-6797

Attorneys for Mossack Fonseca & Co.

Attorneys for Plaintiff NML Capital, Ltd.

IT IS SO ORDERED.

DATED this 16th of July, 2015.

CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Kirk B. Lenhard, Esq.

Kirk B. Lenhard, Esq.
Nevada Bar No. 1437
Nikki L. Baker, Esq.
Nevada Bar No. 6562
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
Attorneys for Plaintiff NML Capital, Ltd.